



Environmental Law Center by Steven P. Compton, Executive Director of MVA Scientific Consultants.

6. Attached hereto as Exhibit 5 is a map with the approximate location of the sediment sample that was the subject of the Report prepared by MVA Scientific Consultants, attached hereto as Exhibit 4.

7. Groundwater monitoring wells at the TVA Gallatin Plant were sampled in July and September of 2015. I am told by consultants who analyzed the samples and I believe that significant contamination by pollutants including Arsenic, Strontium, Zinc, Iron, Lead, Copper, Chromium, and Sulfate were found in the groundwater.

I declare under penalty of perjury that the foregoing is true and correct.

s/ Elizabeth A. Alexander  
ELIZABETH A. ALEXANDER  
October 23, 2015

#### CERTIFICATE OF SERVICE

I hereby certify that the foregoing Declaration of ELIZABETH A. ALEXANDER and Exhibits 1-5 thereto were filed electronically on October 23, 2015 through the Court's Electronic Filing System. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

s/ Elizabeth A. Alexander  
ELIZABETH A. ALEXANDER